

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
) Case No. 3:09-cr-00218-1
v.)
) CHIEF JUDGE HAYNES
REZA KOUSHKBAGHI)

MOTION TO CONTINUE SENTENCING HEARING

The Defendant, by and through counsel, hereby moves to continue the sentencing hearing set for August 12, 2013 at 3:00 P.M. In support of this Motion, the Defendant would state as follows:

1. On May 20, 2013, the Defendant pleaded guilty to conspiracy to distribute and to possess with intent to possess opium in violation of 21 U.S.C. § 846 in Case No. 3:09-cr-00218-1 and his sentencing hearing is set for August 12, 2013 at 3:00 P.M. on that case.

2. The Defendant was charged with money laundering pursuant to an felony information on May 29, 2013 in Case No. 3:13-cr-00100.

3. The Defendant had initially intended to plead guilty to money laundering and enter into a voluntary plea of guilty in Case No. 3:13-cr-00100 and to be sentenced on both cases on August 12, 2013.¹

4. The Defendant now questions whether there is a factual and/or legal basis to enter a guilty plea on a charge of money laundering.

5. The parties have engaged in discussions and legal research regarding the money laundering charge, but agree that they need to determine if there is going to be a dispute as to whether Mr. Koushkbaghi is guilty of the money laundering. Both parties are currently researching

¹ Mr. Koushkbaghi signed a plea agreement pleading guilty to the drug conspiracy and money laundering charge, but the plea agreements were reserved until sentencing.